BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Docket No. MC2001-1

NEWSPAPER ASSOCIATION OF AMERICA NOTICE OF INTENT TO CONDUCT ORAL CROSS-EXAMINATION AND DESIGNATION OF WRITTEN CROSS-EXAMINATION OF POSTAL SERVICE WITNESS THOMAS M. SCHERER (USPS-T-1) May 16, 2001

The Newspaper Association of America ("NAA") hereby gives notice of its intent to conduct oral cross-examination of United States Postal Service witness Thomas M. Scherer (NAA/USPS-T-1). NAA expects to focus its cross-examination principally on his testimony regarding eligibility for the proposed experimental rates.

NAA designates the following interrogatory responses as its written crossexamination of this witness.

NAA-T1 POIR 1-5

1 (questions 2 & 3)

Respectfully submitted,

NEWSPAPER ASSOCIATION OF AMERICA

Robert J. Brinkmann, Esq. Vice President and Counsel, Postal and Regulatory Affairs NEWSPAPER ASSOCIATION OF AMERICA 529 14th Street, N.W. Suite 440 Washington, D.C. (202) 638-4792 William B. Baker WILEY, REIN & FIELDING 1776 K Street, N.W. Washington, D.C. 20006-2304 (202) 719-7255

Certificate of Service

I hereby certify that I have this 16th day of May, 2001, caused to be served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in accordance with sections 12 and 20(c) of the rules of practice.

William B. Baker